

## **EXHIBIT 2**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SONJA KOHN, INFOVALEUR, INC., & TECNO  
DEVELOPMENT AND RESEARCH LTD.,

Defendants.

Adv. Pro. No. 10-5411 (SMB)

**[PROPOSED] ORDER GRANTING MOTION FOR  
LEAVE TO FILE A THIRD AMENDED COMPLAINT**

**THIS MATTER**, having come before the Court on Plaintiff's Motion for Leave to File a Third Amended Complaint (the "Motion"), and the Court having considered the submissions in support of and in opposition to (if any) the Motion, and the Court having found good cause for the relief sought in the Motion, it is hereby **ORDERED** that:

1. The Motion is granted.
2. Plaintiff's Third Amended Complaint, in substantially the form attached to the Notice of Motion, is to be filed on or before \_\_\_\_\_, 2014.
3. Defendants Robert Reuss and Andreas Schindler are dismissed from this action without prejudice.
4. The caption is amended to reflect the dismissal of all defendants other than Sonja Kohn, Infovaleur, Inc., and Tecno Development and Research Ltd, as set forth in the Third Amended Complaint and the Voluntary Notice of Dismissal filed on November 26, 2014, ECF No. \_\_\_\_.

SO ORDERED.

Dated: December \_\_\_\_, 2014  
New York, New York

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE